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District of Nevada

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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BARBARA SCHENK,

Plaintiff,

v.

ANDREW SAUL,
Commissioner of Social Security,

Defendant.

Case No.: 2:19-cv-02062-DJA

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Andrew Saul, Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and Remand (Dkt. No. 13, filed on March 25, 2020), currently due on April 24, 2020, by 30 days, through and including May 26, 2020. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 11) be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension due to Defendant's counsel's workload as described below. Since Plaintiff's motion was filed on March 25, 2020, Defendant's counsel has worked on approximately 18 district court cases. Counsel is also responsible for other substantive non-litigation matters in the Office of General Counsel. The

1 Office of General Counsel also currently has a number of attorneys out on leave of absence, in
2 addition to staff attrition, which has increased the undersigned's workload at a time when the office is
3 under a hiring freeze.

4 Additional time is required to review the record, to evaluate the numerous issues raised in
5 Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's
6 response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as
7 possible. This request is made in good faith and with no intention to unduly delay the proceedings,
8 and counsel apologizes for any inconvenience.

9 On April 17, 2020, counsel for Defendant conferred with Plaintiff's counsel, who has no
10 opposition to this motion.

11 It is therefore respectfully requested that Defendant be granted an extension of time to respond
12 to Plaintiff's Motion for Reversal and Remand, through and including May 26, 2020.

13
14 Dated: April 17, 2020

Respectfully submitted,

15 NICHOLAS A. TRUTANICH
16 United States Attorney

17 /s/ Allison J. Cheung
18 ALLISON J. CHEUNG
19 Special Assistant United States Attorney

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21 IT IS SO ORDERED:

22 
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: April 21, 2020
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CERTIFICATE OF SERVICE

I, Allison J. Cheung, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME (*FIRST REQUEST*)** on the date, and via the method of service, identified below:

CM/ECF:

Marc Kalagian
marc.kalagian@rksslaw.com
Attorney for Plaintiff

Leonard Stone
lstone@shookandstone.com
Attorney for Plaintiff

Attorney for Plaintiff

Dated: April 17, 2020

/s/ Allison J. Cheung
ALLISON J. CHEUNG
Special Assistant United States Attorney